

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MASS.  
2004 JAN -7 A. 10:38

MARK E. FEINERSTEIN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

Civil Action No. 03 12474 (MLW)

MARSH & MCLENNAN COMPANIES, INC.,  
PUTNAM INVESTMENTS TRUST, PUTNAM  
INVESTMENT MANAGEMENT LLC, PUTNAM  
INVESTMENT FUNDS, PUTNAM  
INTERNATIONAL CAPITAL OPPORTUNITIES  
FUND, PUTNAM INTERNATIONAL EQUITY  
FUND, PUTNAM INTERNATIONAL GROWTH  
AND INCOME FUND, PUTNAM INVESTORS  
FUND, and DOES 1-100,

Defendants.

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, the above-captioned action was filed in this Court on December 8, 2003;  
and

WHEREAS, on November 12, 2003, the Putnam Defendants<sup>1</sup> filed a Motion for Transfer  
or Consolidation Pursuant to 28 U.S.C. § 1407 (the "Motion") with the Judicial Panel on  
Multidistrict Litigation (the "Panel"), seeking to transfer related actions pending against them to  
the United States District Court for the District of Massachusetts for coordinated or consolidated

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<sup>1</sup> For purposes of this Stipulation, the "Putnam Defendants" include Marsh & McLennan Companies, Inc.; Putnam Investments Trust; Putnam Investment Management, LLC; Putnam Investment Funds; the various Putnam mutual funds named in this action; and the present or former employees of the Putnam Defendants. The "Putnam Fund Defendants" consist of Putnam Investment Funds, and the named Putnam mutual funds. The "Putnam Management Defendants" consist of Putnam Investment Trust and Putnam Investment Management, LLC.

pre-trial proceedings with the above-captioned action and other related actions currently pending against them in this and other courts;

IT IS HEREBY stipulated and agreed by and between the undersigned counsel that the Putnam Defendants are not required to respond to the complaint filed in the above-captioned action, and that Plaintiffs will file an amended complaint no later than sixty (60) days after the filing date of the Panel's decision regarding the Motion, unless otherwise agreed upon by the parties and assuming no further order of the Court to the contrary. The Putnam Defendants' shall have sixty (60) days to answer, move or otherwise respond to the amended complaint, unless otherwise agreed upon by the parties and assuming no further order of the Court to the contrary.

If the Putnam Defendants move to dismiss the amended complaint, the Plaintiffs shall have sixty (60) days to respond, unless otherwise agreed upon by the parties and assuming no further order of the Court to the contrary. The Putnam Defendants shall have thirty (30) days to reply to any response by the Plaintiffs unless otherwise agreed upon by the parties and assuming no further order of the Court to the contrary.

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Dated: January 6, 2004

SO ORDERED

\_\_\_\_\_, U.S.D.J.

**CERTIFICATE OF SERVICE**

I hereby certify that on this day a true copy  
of the above document was served upon the  
attorney of record for each party by mail by hand.

Date: 1/7/04 BRS